

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) CRIMINAL NO. 05-10067-PBS
TALMUS R. TAYLOR)

DEFENDANT'S MOTION TO SUPPLEMENT SENTENCING MEMORANDUM

Defendant Talmus R. Taylor respectfully moves to supplement Defendant's Sentencing Memorandum, filed on July 7, 2006, by notifying the court of his intention to call two witnesses to testify regarding defendant's employment as a Boston Public School teacher. The two witnesses are: Richard Stutman, President, Boston Teachers Union; and Craig Lankhorst, Principal, Emily A. Fifield School. It is anticipated that their total testimony will not exceed fifteen minutes.

In support of this motion defendant says that his attorney either did not receive, or received and inadvertently deleted, the Procedural Order Re: Sentencing dated March 29, 2006, and was not aware of same until he received the government's Motion for Leave to File Sentencing Memorandum Late on July 11, 2006.

Dated: July 11, 2006

By his attorney,

/s/ Bruce T. Macdonald

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